AFFIDAVIT OF GERALD ARMSTRONG

STATE OF MASSACHUSETTS

COUNTY OF SUFFOLK

I, GERALD ARMSTRONG, being duly sworn, hereby
declare:

- 1) I was involved with Scientology from 1969 through 1981, was with and worked for L. Ron Hubbard personally during many of those years, and held many positions in the top Scientology organizations including the Personal Office of L. Ron Hubbard.
- 2) I was present at the La Quinta properties in California in 1978 during the period that Dell and Ernie Hartwell were there, and personally observed them both on many occasions.
- 3) During that period I held many positions including executive posts, in the film crew to which Dell and Ernie were recruited. I am very familiar with the various La Quinta properties and practices and policies of L. Ron Hubbard and the La Quinta Scientology organizations during 1978.
- 4) During the spring and summer of 1978, the film crew and grounds personnel were working very long hours, usually 16 hours per day. I observed Dell many times working in the wardrobe unit, and observed Ernie working in editing on grounds and cutting wood.

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- I became aware at one point that Ernie had asked to leave the La Quinta base. As a result, he was separated from the rest of the group and labelled a "Suppressive Person." A Suppressive Person is considered by L. Ron Hubbard, and consequently Scientologists, to be psychotic, evil and destructive. Suppressive Persons are subject to the "Fair Game doctrine," a policy initiated by L. Ron Hubbard, which states that the Suppressive Person "may be deprived of property or injured by any means by any Scientologists without any discipline of the Scientologist. May be tricked, sued or lied to or destroyed." The Scientology organization has claimed that this policy was cancelled but that is absolutely not the case. Hubbard ordered that the words "Fair Game" not be used, but the policy regarding theft from Suppressive Persons, or tricking, suing, lying to or destroying them was not changed. I have myself been the target of the Fair Game doctrine since 1981. The Fair Game doctrine is used against anyone perceived by Hubbard or Scientology to be a threat or an enemy.
- 6) People could not leave the La Quinta base without permission, and when some individuals did leave without permission, others were sent after them to find them and to get them back. There was no easy way to get off the base as it was in the desert and several miles from any road with public transportation. Anyone who sought to leave the base permanently as was the case with Ernie Hartwell, was detained,

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subjected to electronically metered interrogatories and forced to sign various waivers and bonds before they could leave.

Such people were ostracized by the rest of the crew, continually watched, and not trusted. The last few weeks Ernie was at La quinta he was put under guard.

I do not know what representations Sue Mithoff, Pam Doherty or William Fosdick or others made to the Hartwells. I have personal knowledge of the following facts. Doherty, Fosdick & Mithoff were on special assignment to recruit people to come to the desert in La Quinta, California. They were required to recruit a minimum quota of individuals and if they did not succeed they would be subject to punishment. It was the well-known policy of the Sea Org that misrepresentations could be made to potential Sea Org members in order to get them to join. Doherty, Fosdick and Mithoff knew that the people they recruited would only be going to La Quinta and would not be going to Clearwater, Florida. They knew that persons at La Quinta were required to work very long hours, far more than five hours per day. knew that none of the people they recruited would be staying in nice motels with swimming pools. They knew that the La Quinta base did not need any dancersor entertainers or provide professional drama training to new members. They knew that automobiles were scarce and base members would not have free use of the few cars there; indeed base members were restricted to the base most of the time. They knew that auditing was

very limited at La Quinta and at the time the Hartwells were recruited, almost the only type of "auditing" going on were security checks (interrogation for security purposes).

All of the above facts were common knowledge to all person who had spent any time on the La Quinta base. It was also common knowledge that people recruited into the Sea Org were not told that their "auditing" files were not confidential and that if they sought to leave they would be declared "suppressive," harassed, billed for any "auditing," "training" or "sec checks received," disconnected from any friends or family still in the organization, and made subject to the Fair Game doctrine, all of which were practices of Scientology, pursuant to the orders of L. Ron Hubbard.

Signed under the pains and penalties of perjury this 19th day of September, 1985.

GERALD ARMSTRONG

Suffolk County

9/20/85

Then personally appeared before me the above named Gerald Armstrong and aknowledged the foregoing to be his free act and deed.

Before me,

Lorna E. Doherty

Notary Public

My Commission Expires 3/31/89